

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

§

*Plaintiffs,*

§

V.

§

GREG ABBOTT, *et al.*,

§

Case No. 5:21-cv-00844-XR  
[Lead Case]

*Defendants.*

§

HARRIS COUNTY REPUBLICAN PARTY, *et  
al.*,

§  
§  
§  
§

*Intervenor-Defendants.*

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**UNOPPOSED JOINT MOTION TO EXTEND DEADLINE TO CONCLUDE  
DISCOVERY RELATED TO THE 2022 PRIMARY ELECTION BY OR UPON  
DEFENDANT INTERVENORS HARRIS COUNTY REPUBLICAN PARTY, ET AL.**

Plaintiff La Union del Pueblo Entero, *et al.* and Defendant Intervenors Harris County Republican Party, *et al.* file this joint motion to request that the Court extend the deadline to conclude discovery by or upon Defendant Intervenors on matters related to the primary election to March 3, 2023.

On December 9, 2022, the Court ordered “[t]he deadline for discovery by or upon Defendant Intervenors on matters related to the primary election is hereby extended to January 27, 2023.” ECF 490.

Private Plaintiffs and Defendant Intervenors met in good faith on January 6, 2023, and exchanged emails on December 13, December 27, January 2, January 4, January 5, January 12, and January 16. Private Plaintiffs and Defendant Intervenors have made progress with respect to

negotiating the scope of document production and depositions but need additional time to complete this phase of discovery.

LUPE Plaintiffs and Defendant Intervenors therefore respectfully request that the deadline to conclude discovery by or upon Defendant Intervenors with respect to the 2022 Primary Election be extended to March 3, 2023. LUPE Plaintiffs and Defendant Intervenors make this request jointly and not for the purposes of delay. No other party opposes this motion.

January 26, 2023

Respectfully submitted,

/s/ Nina Perales

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**CERTIFICATE OF CONFERENCE**

I certify that I conferred with counsel for the Plaintiffs, Defendants and Intervenor-Defendants regarding this motion on January 25 and 26. Intervenor-Defendants join this motion. Defendants do not oppose this motion. Plaintiff the United States does not oppose this motion. Private Plaintiffs Mi Familia Vota, HAUL, OCA-Greater Houston, *et al.* and LULAC do not oppose this motion.

/s/ Nina Perales

NINA PERALES

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 26, 2023, and that all counsel of record were served by CM/ECF.

/s/ Julia R. Longoria  
JULIA R. LONGORIA